

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION  
(TOLEDO)

Jane Doe 1, et al.,  
Plaintiffs,

v.

Manish Raj Gupta, et al.,  
Defendants.

FILED

DEC 13 2022

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
TOLEDO

REQUEST FOR PRODUCTION

COMES NOW, Defendant Manish Raj Gupta, pro se, and hereby propounds the following request for production upon Plaintiff Jane Doe 1:

1. Produce all documents, records, bills, invoices, receipts, cancelled checks, bank records, payment records, lease agreements, deeds, licenses, identification documents, memberships, insurance contracts, utility accounts, employment records, voter registration documents, vehicle registration documents, and any other paper or electronic document or record or file or recording that supports or may not support your claim that you were a citizen and resident of and domiciled in the State of California from January 24, 2022, and continuously without interruption through June 26, 2022.

2. Produce all income tax returns, tax bills, payments of taxes, and any and all documentation showing that state and local taxes of all kinds have been paid by you in the State of California from January 24, 2022, and continuously without interruption through June


26, 2022, together with any taxes assessed, billed, or paid in any other state or jurisdiction during this time period.

3. Produce all documents, records, bills, invoices, receipts, cancelled checks, bank records, payment records, contracts, terms of service, insurance statements, treatment records, medical records, and any other document or record or file or recording that supports or may not support your claim that you suffered psychologically or mentally in any way caused by the events set forth in your Complaint and any amended complaint filed in this action.

4. Produce all cancelled checks, bank records, payment records, and any other document or record or file or recording that supports or may not support your claim made to the U.S. Attorney's Office and submitted to the U.S. District Court for consideration in its order of restitution in the criminal case, United States v. Manish Raj Gupta, in the Northern District of Ohio, that you had paid the following:


- a. \$300.00 to Orion Johnstone, Sex + Relationships Coach;
- b. \$29,955.00 to Soullight Research School c/o Lawrence Lanoff;
- c. \$17,000.00 to Light Dark Institute for Light Dark Experience I and II;
- d. \$500.00 to Katharine Bainbridge, M.A., M.F.T.;
- e. \$1,800.00 to Brainbasedcounseling in Mason, Ohio, for EMDR Intensive;
- f. \$1,375 to Uplift Psychology Group;
- g. \$650.00 to Ruqayyah Samia;
- h. \$184.81 to Cedars-Sinai;
- i. \$1,050.00 to Tracy Santomarco;
- j. \$875.00 to Paula Thomson, PsyD.; and
- k. \$800.00 to Trauma Transformation LA c/o Leah D. Smith.

RESPECTFULLY SUBMITTED ON THIS 5<sup>th</sup> DAY OF DECEMBER, 2022.

  
\_\_\_\_\_  
Manish Raj Gupta, pro se  
Defendant

Certificate

I hereby certify that a true copy of the foregoing was mailed  
to all counsel of record on this 5<sup>th</sup> day of December 5, 2022.

  
\_\_\_\_\_  
Manish Raj Gupta